



June 14, 2019

The Honorable Connie Leyva  
Chair, Senate Education Committee  
California Senate  
State Capitol  
Sacramento, CA 95814

*Via Senate Education Committee Letter Portal*

**Re: AB 751 (O'Donnell) – Oppose**

Dear Senator Leyva:

The undersigned organizations have been highly engaged stakeholders in the development of California's new multiple measures accountability system under the Local Control Funding Formula (LCFF) since it was proposed in 2012. We are committed to ensuring that our K-12 public school system provides equitable opportunities for *all* students, including low-income students, students of color and English learners. We oppose AB 751 (O'Donnell) to allow school districts and charter schools to replace the California Assessment of Student Performance and Progress (CAASPP) or the Smarter Balanced Assessment Consortium (SBAC) assessment administered in 11<sup>th</sup> grade with the Scholastic Aptitude Test (SAT) or the ACT because of its impacts on California's diverse student population and our K-12 school accountability system. Specifically, we have the following concerns:

1. **AB 751 would encourage the use of the SAT or ACT, nationally normed standardized assessments which have been found to be biased against low-income students, students of color and English learners.** With the diversity of backgrounds that our students represent, California should be leading the way to explore whether there are more equitable ways to determine college admission and placement besides nationally normed standardized tests.

Reliance on the SAT is troubling especially for a state as diverse as California. Research has shown the unfairness of the SAT to different California high school student groups, particularly between African American and White students.<sup>1</sup> More recent research by PACE<sup>2</sup> found that for CSU students the SBAC predicts college outcomes as well as the SAT and that high school GPA is a stronger predictor of college outcomes than either assessment. For UC students, PACE found

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<sup>1</sup> Santelices, M. V., & Wilson, M. (2010). Unfair Treatment? The Case of Freedle, the SAT, and the Standardization Approach to Differential Item Functioning. Harvard Education Review. <http://dx.doi.org/10.17763/haer.80.1.j94675w001329270>

<sup>2</sup> Kurlander, M. & Cohen, K. (March 2019). Predicting College Success: How do Different High School Assessments Measure Up? Policy Analysis for California Education. Available: [https://edpolicyinca.org/sites/default/files/R\\_Kurlaender\\_Mar-2019.pdf](https://edpolicyinca.org/sites/default/files/R_Kurlaender_Mar-2019.pdf)

that none of the measures by themselves—SAT scores, SBAC scores, or high school GPA—are strong predictors of second-year persistence, and that SAT scores are only marginally better than SBAC scores at predicting first-year performance. These patterns held for different student groups based on race and ethnicity, socioeconomic status and by high school quality.

Moreover, some colleges and universities in California have already agreed to accept specified performance levels on the SBAC to bypass remedial courses or waive.<sup>34</sup> As this practice increases, the SBAC will have more of a personal consequence for high school students.

AB 751 will not level the playing field for low-income students' access to preparation courses and fees for retaking the exam. Even more inequity would result if a district privileges the SAT or ACT.

The SAT & ACT's accommodations for English learners are inadequate to allow them to demonstrate their knowledge and skills. Accessibility for all languages and abilities is not a goal of the SAT/ACT, unlike SBAC.

2. **AB 751 would weaken California's accountability system, the California School Dashboard, which has been years in the making, since LCFF was established in 2013.** If school districts are allowed to ignore the one high school test that the system is based on—the SBAC—comparability is not likely, even though AB 751 requires it. As advocates of low-income students, students of color and English learners, we are skeptical that the level of technical comparability needed to make fair comparisons between the SBAC and the SAT/ACT results could be developed for fair use in the Dashboard.

For these reasons, we respectfully oppose AB 751 and urge you to vote no.

Sincerely,



Liz Guillen  
Director of Legislative & Community Affairs  
Public Advocates Inc.



Taryn Ishida  
Executive Director  
Californians for Justice



Shelly Spiegel Coleman  
Executive Director  
Californians Together

Cc: Assembly Member Patrick O'Donnell  
Roger Mackensen, Senate Republican Caucus Consultant

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<sup>4</sup> Letter from Dr. Edward H. Haertel, Stanford to Senator Leyva, May 23, 2019.